

1 KATHERINE M. FORSTER (State Bar No. 217609)
Katherine.Forster@mto.com
2 CRAIG JENNINGS LAVOIE (State Bar No. 293079)
Craig.Lavoie@mto.com
3 LAUREN N. BECK (State Bar No. 343375)
Lauren.Beck@mto.com
4 KYRA E. SCHOONOVER (State Bar No. 343166)
Kyra.Schoonover@mto.com
5 MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
6 Los Angeles, California 90071-3426
Telephone: (213) 683-9100
7 Facsimile: (213) 687-3702

8 Attorneys for Defendant BLACKBERRY
CORPORATION

9
10 **UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12 NEELAM SANDHU, an individual,

13 Plaintiff,

14 vs.

15 BLACKBERRY CORPORATION, a
Delaware Corporation,

16 Defendant.

Case No. 3:24-cv-02002-SK

**DECLARATION OF LAUREN N. BECK
REGARDING CORRECTIONS TO DKT.
NO. 112**

Judge: Hon. Sallie Kim

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5
6
7
8

9
1011
12
13

14
15
16
17
18

19
20
21
22
23
24

25
26
27
28

1 of third parties. BlackBerry called the ECF helpdesk, which promptly locked the exhibits.
2 BlackBerry then filed a Motion to Lock Improperly Filed Documents (Dkt. No. 115), requesting
3 that the Court seal the five docket entries in question (Ex. 3 (Dkt. 111-7), Ex. 9 (Dkt. 111-12), Ex.
4 30 (Dkt. 111-33), Ex. 31 (Dkt. 111-34), and Ex. 34 (Dkt. 111-37)). BlackBerry has since filed
5 revised public-redacted versions of those five exhibits (Dkt. No. 116).

6 7. With this filing, BlackBerry is now submitting revised, under-seal versions of those
7 five exhibits (Exhibits 3, 9, 30, 31, and 34). The revised, under-seal versions of those exhibits
8 reflect the changes described in the Declaration of Lauren N. Beck Regarding Exhibits to Dkt. No.
9 111 (Dkt. No. 116).

10 8. With this filing, BlackBerry is also submitting a **Supplemental Declaration of**
11 **Jennifer Bramhill**, which describes the additional material BlackBerry now seeks to seal in
12 Exhibits 3, 9, 30, 31, and 34.

13 9. To consolidate the materials related to BlackBerry's sealing motion and avoid
14 creating confusion on the docket, BlackBerry is now submitting, as one consolidated filing: (1) the
15 **revised, under-seal versions of the five exhibits filed at Dkt No. 116**, which reflect changes
16 described in the Declaration of Lauren N. Beck Regarding Exhibits to Dkt. No. 111 (Dkt. No.
17 116); (2) a **Supplemental Declaration of Jennifer Bramhill**, which describes the additional
18 material BlackBerry now seeks to seal in Exhibits 3, 9, 30, 31, and 34; (3) a **Revised Proposed**
19 **Order**, which reflects the additional material BlackBerry now seeks to seal in Exhibits 3, 9, 30, 31,
20 and 34; and (4) the **remaining materials that were originally filed at Dkt. Nos. 112 and 113**,
21 which are filed without any changes.

22 10. Except for the changes described above, no changes have been made to the content
23 of any of materials included in this filing.

24
25 I declare under penalty of perjury under the laws of the United States that the foregoing is
26 true and correct. Executed on this 12th day of December, 2025, at Los Angeles, California.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: December 12, 2025

By: /s/ Lauren N. Beck -

Lauren N. Beck